

## REMARKS

Claims 1-24 are currently pending in the application. In the Office Action dated May 7, 2004 ("Office Action"), the Examiner rejected claims 1-24 under 35 USC §103(a) as being unpatentable over Guedalia, U.S. Patent No. 6,356,283 B1 ("Guedalia") in view of Beri et al., U.S. Patent No. 6,141,018 ("Beri"). Applicants respectfully traverse the above-mentioned 35 USC §103(a) rejections.

Applicants' representative appreciates the Examiner's acknowledgement of certain of Applicants' representative's points made in the recently filed Appeal Brief. Guedalia, alone, clearly neither anticipates nor makes obvious the current invention claimed in claims 1-14. However, in Applicants' representative's opinion, Beri does not provide sufficient additional disclosure, in combination with Guedalia, to teach or suggest Applicants' claimed invention.

Consider independent claim 1, provided below for the Examiner's convenience, with emphasis added:

1. A method for associating an active region with a corresponding position within an image included in a page displayed by a browser running on a client computer, the method comprising:

sending a request by the browser to a server for a description of a page that includes a specification of the image and an associated client-side image map, the client-side image map specifying a shape, size, and location of the active region within the image and specifying actions to be performed in response to input events directed to the active region;

receiving from the server in response to the request a description of the requested page that includes an invocation of a viewer for displaying the image, the invocation including parameters that describe the image and the client-side image map;

instantiating the viewer and passing to the viewer the parameters included in the invocation;

***storing by the viewer representations of active regions within the image in image-relative coordinates*** along with indications of the actions to be performed in response to input events directed to the active region; and

***when an input event is detected by the browser during display of the page, passing the input event by the browser to the viewer, and when the viewer determines that the input event was input to a position within the image corresponding to the active region, determining an action specified for performance in response to the input event to the active region and calling for performance of the determined action.***

As the Examiner undoubtedly recalls, the "storing by the viewer representations of active region within the image in image-relative coordinates" element has been a point of argument throughout prosecution of the current application. In the Office Action, in fact, the Examiner states that "Applicants argue that Guedalia does not teach or suggest representations of active regions within an image for display as part of the displayed web page in image-relative coordinates (Remarks, page 17). Examiner agrees." However, Beri also does not teach or suggest storing representations of active regions within the image in image relative coordinates. Beri does not mention or suggest that Beri's marquee window, or the web page in which it is displayed, is dynamically resizable, and does not provide any other motivation for using image-relative coordinates. In one embodiment, Applicants use image-relative coordinates to maintain the correspondence between active regions specified in a client-side image map and a displayed image. Beri not only does not teach or suggest image-relative coordinates, but, in fact, Beri explicitly teaches quite the opposite.

First, on lines 23-26 of column 3, Beri explicitly states that "the hypertext document that defines the Web page identifies the image to be displayed in a marquee window, identifies the size of the marquee window, and identifies the type of animation to be applied when the image is displayed." Next, in the table towards the end of column 5, and in the text beginning on line 14 of column 5 and extending to line 65 of column 6, Beri outlines the parameters that can be passed from an HTML viewer to an instantiated marquee object that is instantiated by an HTML viewer (lines 25-26 of column 5) and that, in turn, instantiates an HTML viewer to display the marquee (lines 32-34 of column 5). The parameters include a "ZOOM" parameter and a "Width of Page" parameter, described by Beri as follows, on lines 58-63 of column 6 (emphasis added):

The Zoom parameter indicates a percentage *by which the image being scrolled* is to be reduced/enlarged. The one-to-one aspect ratio is maintained on "zoomed" pages. A value of -1 indicates that the *image is resized to fit in the marquee window* (one-to-one aspect ratio not necessarily kept as a result).

The WidthOfPage parameter specifies the width **in pixels** to format image.

Clearly, both the parameter *Zoom* and the parameter *WidthOfPage* are directed to display of the scrolling image within the marquee window, as discussed in detail in columns 3 and 4 of Beri, with reference to Figures 1A-3F of Beri. In other words, the parameter Zoom has nothing to do with altering the display of the marquee

window frame, or the enclosing web-page display, but only with sizing the image to be displayed within the marquee window. The marquee window is not suggested to be resizable in Beri. The parameters *Zoom* and *WidthOfPage* are supplied by the HTML viewer to the marquee window during instantiation of the marquee window, as clearly indicated in Beri on lines 20-31 of column 5. Beri does not suggest that the image can be altered dynamically during display. There is therefore no need for the marquee object, or the HTML viewers or browser, to maintain image-relative coordinates, and there is absolutely no suggestion in Beri that image-relative coordinates are involved at any level of any of the browser, HTML viewer, or marquee object. Moreover, the parameter *WidthOfPage* is specified in pixels. Pixels represent an absolute display metric, explicitly tied to the physical display device, and are not in any way image-relative coordinate specifications.

Another claimed element is that "when an input event is detected by the browser during display of the page, passing the input event by the browser to the viewer," as indicated with emphasis in claim 1, above. By contrast, Beri discloses a much different architecture for the marquee object, beginning in line 65 of column 6:

The marquee object notifies the HTML viewer when various events occur. These events include the start of image display, the end of image display, an indication of the bounds, indication of a scroll, or an indication that the left mouse button has been pressed. When the Web browser receives an event and the HTML document contains an even handler (e.g., in VB Script) for that event, the Web browser invokes a scripting engine to execute the event handler.

There is no mention in Beri that the marquee object is passed events by the web browser. There is nothing in Beri that suggests "when the viewer determines that the input event was input to a position within the image corresponding to the active region, determining an action specified for performance in response to the input event to the active region and calling for performance of the determined action."

Please next consider claim 11 of the current application, provided below, with emphasis added:

11. A method for serving a description of a page from a server to a browser running on a client computer that requests the page, the description of the page provided to the browser by the server containing an invocation of a viewer, ***the invocation including parameters that specify an image included in the page and an active region within the image***, the method comprising:  
receiving a request from the browser by the server for a description of the page that includes a specification of the image ***and an associated client-side image map***, the client-side image map specifying a shape, size, and

location of the active region within the image and that specifies actions to be performed in response to input events directed to the active region;

retrieving a description of the page;

*determining the capabilities for viewing pages provided by the browser running on the client computer;* and

*when the browser, running on the client computer, is capable of accepting display altering commands from a user while displaying a page,*

parsing the description of the page to find the specification of the image and the client-side image map included in the page,

substituting, in the description of the page, an invocation of a viewer for the specification of the image and the client-side image map included in the page, including in the invocation parameters that specify the image and the client-side image map, to create a transformed page description, and

sending the transformed page description to the browser.

Applicants' representative confesses to not understanding the Examiner's statements regarding claim 11. However, Applicants' representative at least understands from the Examiner's statements that the Examiner agrees that Guedalia alone does not make claim 11 obvious. That being the case, Applicants' representative cannot understand how Beri adds anything substantial to a combination of Guedalia and Beri with respect to claim 11. First, please note in claim 11 that the browser requests from a server "a description of the page that includes a specification of the image and an associated client-side image map." Applicants' representative can find nothing in either Guedalia or Beri teaching or suggesting that a server transmits both an image specification and a client-side image map to a web-browser-running computer. Secondly, in claim 11, an invocation of a viewer includes "parameters that specify an image included in the page and an active region within the image." As discussed many times before, Guedalia handles active region descriptions on the server, not on the client. In Beri, the marquee object invokes an HTML viewer, but does not specify to the viewer an active region with the image. There is no active region in the image. The marquee object notifies the HTML viewer when events occur, as discussed above, and stated explicitly in Beri beginning on line 65 of column 6. Moreover, as also explicitly stated in Beri, the browser invokes a scripting engine to execute an event handler, not the marquee object or the HTML viewer invoked by the marquee object. Finally, claim 11 clearly states that "when the browser, running on the client computer, is capable of accepting display altering commands from a user while displaying a page." In other words, display altering commands in claim 11 are provided by a user. There is absolutely no teaching or


suggestion in Beri for user-specified commands that alter display of a page while the page is being displayed. The parameters *Zoom* and *WidthOfPage* are provided by an HTML viewer to a marquee object, and are provided during invocation of the marquee object, as discussed on lines 27-31 of column 5 of Beri. Beri neither includes an indication that the web pages that include a marquee window are dynamically alterable or resizable, nor any other motivation for dynamic alteration of web pages by users. In short, Beri is unrelated to the claimed invention.

Claim 18 specifically mentions image-relative coordinates on the client side, and neither Guedalia nor Beri teach, suggest, or mention image-relative coordinates. Like independent claims 1 and 11, claim 18 is not made obvious by a combination of Guedalia and Beri.

In conclusion, while Applicants' representative understands that the Examiner has included Beri to show invocation of a viewer on the client side in response to an indication included in a web-page description, which Applicants' representative acknowledges that Beri does disclose, Applicants' representative believes that other aspects of the current invention, discussed above, and clearly claimed in independent claims 1, 11, 18, and the dependent claims that depend from them, are not taught or suggested by Beri, Guedalia, or a combination of Beri and Guedalia. Applicants' representative sincerely believes that the current application has been extensively discussed, and that the maintenance of the correspondence between active regions and a dynamic, displayed web page on a client computer, well-described in the current application and clearly claimed, has not been shown to be taught or suggested in any cited reference.

All of the claims remaining in the application are now clearly allowable. Favorable consideration and a Notice of Allowance are earnestly solicited.

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